

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

SHERRI L. DAVIS, et al.,

PLAINTIFFS

vs.

Case No. 2:06-cv-00187-ID-SRW

**TMA FOREST PRODUCTS
GROUP, etc., et al.,**

DEFENDANTS

**CONSENT MOTION FOR ENLARGEMENT OF TIME
TO RESPOND TO COMPLAINT**

Pursuant to Fed. R. Civ. P. 6(b), Defendants Pactiv Corporation (“Pactiv”) and Louisiana-Pacific Corporation (“Louisiana-Pacific”) jointly move this Court for an order enlarging the time by which they may answer, plead, move, or otherwise respond to Plaintiff’s Complaint through and including March 22, 2006. In support of this motion, Defendants state the following:

1. This case is one of six related lawsuits originally filed in the Circuit Court of Covington County, Alabama, on January 30, 2006: *Davis v. TMA Forest Products Group*, CV-06-19; *Douglas v. TMA Forest Products Group*, CV-06-20; *Kelley v. TMA Forest Products Group*, CV-06-21; *Cravey v TMA Forest Products Group*, CV-06-22; *Madden v. TMA Forest Products Group*, CV-06-23; and *Thompson v.*

TMA Forest Products Group, CV-06-24 (the “Removed Cases”). Prior to responding to Plaintiffs’ Complaints in these cases, Defendants removed the cases to this court on February 28, 2006. Thus, the time in which Defendants must answer, plead, move, or otherwise respond has not expired in any of the Removed Cases.

2. This case is also related to four lawsuits pending against Pactiv and Louisiana-Pacific in this Court: *Chambers v. Pactiv Corp.*, Civ. No. 2:06-CV-83-WKW; *Phillips v. Pactiv Corp.*, Civ. No. 2:06-CV-84-WKW; *Thompson v. Pactiv Corp.*, Civ. No. 2:06-85-WKW; and *Edwards v. Pactiv Corp.*, Civ. No. 2:06-CV-86-WKW. By order dated February 23, 2006, this Court enlarged the time for Defendants to respond to the First Amended Complaints in these cases to March 22, 2006.
3. Counsel for Defendants have conferred with W. Eason Mitchell, co-counsel of record for Plaintiff in this case. Mr. Eason has authorized counsel for Defendants to represent to this Court that he consents and agrees that Defendants may answer, plead, move, or otherwise respond to Plaintiffs’ Complaints in the Removed Cases through and including March 22, 2006.

WHEREFORE, Defendants respectfully request that this Court enter an order enlarging time to respond to Complaint.

This 2nd day of March, 2006.

/s/ H. Thomas Wells, Jr.
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John A. Earnhardt
Alabama Bar No. EAR006
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CERTIFICATE OF SERVICE

I hereby certify that on this the 2nd day of March, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notice of such filing to the following:

W. Eason Mitchell

Gregory A. Cade

H. Thomas Wells, Jr.

John A. Earnhardt

/s/ Dennis R. Bailey _____
Of counsel